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January 13, 2025

VIA ECF

Hon. Mary Kay Vyskocil
U.S. District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *United States Polo Association, Inc. v. Rivers World LLC*, 1:23-cv-10818 (MKV)

Dear Judge Vyskocil:

We represent plaintiff United States Polo Association, Inc. (“USPA”) in the above referenced matter. We write because the application for *pro hac vice* admission for Daniel J. Barsky is due today per Your Honor’s December 23, 2024 Order (Dkt. No. 21). Mr. Barsky submitted a request to the Florida Supreme Court for a copy of his Certificate of Good Standing earlier this month and provided the Florida Supreme Court with a prepaid FedEx overnight shipping label, but has not received the certificate as of the time of this filing. We understand that an application with a Certificate of Good Standing from the Florida Bar will not be accepted for filing pursuant to the Local Rules.

We submit Mr. Barsky’s intended *pro hac vice* application papers (with an explanation of the Certificate of Good Standing) as exhibit A hereto. We also include a copy of his Certificate of Good Standing issued by the Florida Bar as Exhibit B demonstrating that Mr. Barsky is, in fact, a member in good standing of the Florida Bar. Pursuant to Your Honor’s Individual Rules of Practice, Rule 2.G, we respectfully request an extension of time to file Mr. Barsky’s application for *pro hac vice* admission with the Certificate of Good Standing from the Florida Supreme Court. We apologize for the delay in seeking this request. We had hoped to receive the Certificate of Good Standing by today and are uncertain as to the cause of the delay from the Florida Supreme Court but are following up with the Court.

The original and current deadline for filing Mr. Barsky’s *pro hac vice* admission application is January 13, 2025. *See* Dkt. No. 21. This is the first request for an extension for these papers.

Rivers World LLC (“Defendant”) has consented to this request through counsel.

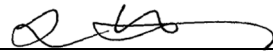
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The default judgment hearing is scheduled for January 27, 2025. Defendant requested and was granted an extension to file an opposition to the motion for default judgment by January 17, 2025. There are no other deadlines or scheduling orders entered in this case, and the requested extension will not affect any deadlines in this case.

For all the reasons stated above, USPA respectfully requests additional time for receipt of Mr. Barsky's Certificate of Good Standing from the Florida Supreme Court and to file his application for *pro hac vice* admission.

Respectfully submitted,


HOLLAND & KNIGHT LLP



Leonie Huang

This request is untimely. Parties are admonished to review this Court's Individual Rules of Practice. The parties are reminded that failure to comply with this Court's Individual Practice Rules may result in sanctions, including monetary penalties on counsel and/or the parties, dismissal or preclusion of claims, defenses, arguments, or evidence. Further, since this request was filed, Mr. Barsky has been admitted *pro hac vice*. [ECF No. 28]. Nevertheless, Plaintiff's request is HEREBY GRANTED *nunc pro tunc*.

Date: 1/17/2025
New York, New York



Mary Kay Vyskocil
United States District Judge